IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF VIRGINIA ABINGDON DIVISION

UNITED STATES OF AMERICA

v. CASE NO. 1:19cr00016

INDIVIOR INC. (a/k/a Reckitt Benckiser Pharmaceuticals Inc.) and INDIVIOR PLC

DEFENDANTS' MOTION TO COMPEL

Defendants Indivior Inc. and Indivior PLC (collectively, "Indivior" or "Defendants"), through undersigned counsel, respectfully request that the Court enter an order requiring the government to comply with its obligations under Federal Rule of Criminal Procedure 16(a)(1)(E) and *Brady v. Maryland*, 373 U.S. 83 (1963). The government's specific failures and the details of Indivior's requests are set forth in the accompanying Memorandum in Support of Defendants' Motion to Compel.

Dated: August 16, 2019

Respectfully submitted,

INDIVIOR INC. (a/k/a Reckitt Benckiser Pharmaceuticals Inc.) and INDIVIOR PLC

/s/ Thomas J. Bondurant, Jr.

By Counsel

Thomas J. Bondurant, Jr. **Gentry Locke**

10 Franklin Road SE Roanoke, Virginia. 24022 (540) 983-9389 bondurant@gentrylocke.com

Jennifer S. DeGraw

Gentry Locke

10 Franklin Road SE Roanoke, Virginia. 24022 (540) 983-9445 degraw@gentrylocke.com

Leigh A. Krahenbuhl (admitted pro hac vice)

Jones Day

77 West Wacker Drive Chicago, Illinois 60601 (312) 269-1524 lkrahenbuhl@jonesday.com

James R. Wooley (admitted pro hac vice)

Jones Day

901 Lakeside Avenue Cleveland, Ohio 44114 (216) 586-7345 jrwooley@jonesday.com

James P. Loonam (admitted *pro hac vice*)

Jones Day

250 Vesey Street New York, New York 10281 (212) 326-3808 jloonam@jonesday.com

Peter J. Romatowski (admitted pro hac vice)

Jones Day

51 Louisiana Avenue NW

Washington, D.C. 20001 (202) 879-7625 pjromatowski@jonesday.com

Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that I caused the foregoing to be presented to the Clerk of the Court for filing and uploading to the CM/ECF system, which will send notification of such filing to all counsel of record, on this 16th day of August, 2019.

/s/ Thomas J. Bondurant, Jr.

Counsel for Defendants